

As the Executive Director of the Washington Society of CPAs, I have instructed my staff to send NO FAX without supervisor approval. The amended rules governing unsolicited fax advertisement are so far-reaching that they extend way beyond the intended target, the unsolicited fax advertisement. We can no longer communicate with our members using this electronic medium without concern for huge financial penalty.

You have effectively destroyed several industries with your amended rules, i.e., the fax machine manufactures and the broadcast fax industry. On the other hand, you have created an illegitimate industry for unscrupulous crooks who can earn an easy \$500 by luring service-oriented staff into responding for a request for information by fax, then submitting a complaint that the fax was unsolicited.

By removing the "established business relationship" qualification from the fax regulations, my staff can no longer send a fax without the following dialogue. "Will you please fax XXX to me?" "No, I need to send you by mail or email a consent form; you need to fill it out, sign it, and return it to me by fax, mail, or email; then I can fax you the item you are requesting." In this day and age of customer service satisfaction expectation, our members are going to "go ballistic." Our explanation that "IT IS THE LAW" is not going to satisfy their disgust with us for making it so hard for them to get member service.

We will be notifying our 8800 members that they, like us, need to reconsider all their fax transmissions to clients, vendors, or the other firms with which they have established relationships.

In a time when the US economy is shaky, one in five Americans has been laid off in the last five years, and consumers have lost confidence in the American economy, is the FCC certain that it wants to pass regulations that continue to make it slower, harder, and more costly more corporate and not-for-profit America to do business?

I urge the FCC to rethink its actions, respond to the ASAE Petition for Stay and Petition for Emergency Clarification. It is clear that the FCC needs to take the time to understand the unintended consequences of these regulations. Americans are losing confidence and faith in a government that has lost touch with what it takes to make a living in the small business community. Since the small business community provides over 50% of the jobs and income to America, this disregard for the economic machine of the nation may be a greater threat to our nation than all the terrorists the rest of the world can throw at us.